

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF TENNESSEE**

JOHN DOE,)	
)	
<i>Plaintiff,</i>)	
)	
v.)	
)	Civil Action No: 3:23-cv-1335
William Lee, Governor of the State of Tennessee, in his official capacity;)	
)	
And,)	Judge Trauger
)	
David Rausch, Director of the Tennessee Bureau of Investigation, in his official capacity.)	
)	
<i>Defendants.</i>)	

PLAINTIFF’S MOTION TO EXTEND STAY OF PROCEEDINGS

Comes now Plaintiff, by and through Counsel, and moves this Honorable Court to extend the stay of these proceedings indefinitely in light of the detailed, deliberate briefing process currently underway in the Middle District of Tennessee in *John Doe #1, et al. v. William Lee, et al.*, United States Middle District of Tennessee Case No. 3:21-cv-590 (hereinafter “*Does #1 – 9*”).¹ In support of this motion, Plaintiff submits the attached memorandum of law, attached exhibits, and additional exhibits to be filed (with the Court’s permission) under seal.

Plaintiff requests that the Court stay these proceedings indefinitely, until such time as the Middle District’s process in *Does #1 – 9* has ripened to the point at which it is appropriate to resume the individual litigation of Plaintiff’s case.

¹ Per the Sixth Circuit’s ruling, Plaintiff anticipates dropping the Governor from this case via Rule 21 once the stay is ultimately lifted, whenever that might be. However, as a procedural matter it seems simpler to wait until the stay is fully resolved before filing a Rule 21 motion, rather than requesting a temporary termination of the stay to file a Rule 21 only to then ask for the stay to be resumed.

Counsel for Plaintiff has discussed the request articulated in this motion with Counsels for Defendants, who indicate that Defendants oppose the requested relief.

Respectfully submitted,

s/ Kyle Mothershead

s/ Aaron Rothbaum

Kyle Mothershead, BPR 22953
Aaron Rothbaum, BPR 36572
Relentless Advocacy, PLLC
7000 Executive Center Drive, Suite 240
Nashville, TN 37027
T: (615) 891-3901 / F: (615) 229-6387
E: kyle@relentlesslaw.com
E: aaron@relentlesslaw.com

CERTIFICATE OF SERVICE

I hereby certify that on **September 17, 2024**, Plaintiff's **Motion to Extend Stay** was filed electronically with the Court's electronic filing system. Notice of this filing will be served on **Attorneys Nicholas Bolduc, Tyler Sanders, and Rachel Newton, Counsel for Defendants Lee and Rausch**, at Nicholas.Bolduc@ag.tn.gov, Rachel.Newton@ag.tn.gov, and Tyler.Sanders@ag.tn.gov.

s/ Aaron Rothbaum

Aaron Rothbaum, BPR 36572